

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

ALAN MEAUX,

Plaintiff,

v.

CR BARD INCORPORATED, *et al.*,

Defendants.

CASE NO. 2:20-cv-00517-RAJ-JRC

PRETRIAL SCHEDULING ORDER

This matter is before the Court on referral by the District Court and on the parties' joint status report and proposed scheduling order. *See* Dkts. 19, 25.

A trial date will be set by the assigned District Judge, the Honorable Richard A. Jones, if the case is not resolved by settlement or dispositive motion. The Court sets the following pretrial schedule:

Rule 26(a) disclosures to be served by the Parties	May 21, 2020
Plaintiff will produce the completed plaintiff Fact Sheet and related information utilized in the <i>In re: C. R. Bard, Inc. IVC Filter</i> MDL. The Parties agree that the terms incorporated into the plaintiff Fact Sheet form adopted in MDL 2641 and Federal Rules of Civil Procedure 26,	June 29, 2020

1	33, 34, and 37 shall apply to the completion and supplementation of the plaintiff Fact Sheet.	
2	Defendants will produce the defendant's Fact Sheet and related information utilized in the <i>In re: C. R. Bard, Inc. IVC Filter MDL</i> .	July 27, 2020
3	The Parties agree that the terms incorporated into the defendant Fact Sheet form adopted in MDL 2641 and Federal Rules of Civil Procedure	
4	26, 33, 34, and 37 shall apply to the completion and supplementation of the defendant Fact Sheet.	
5	Fact Discovery deadline	April 5, 2021
6	Expert reports by plaintiff	May 10, 2021
7	Plaintiff's experts deposed	June 14, 2021
8	Expert reports by defendants	July 19, 2021
9	Defendants' experts deposed	August 23, 2021
10	Disclosure of rebuttal expert reports	September 20, 2021
11	Any rebuttal experts deposed, and expert discovery cutoff	October 18, 2021
12	Filing of <i>Daubert</i> motions and other dispositive motions	November 29, 2021

14 This order sets firm dates that can be changed only by order of the Court, not by  
15 agreement of counsel for the parties. The Court will alter these dates only upon good cause  
16 shown. Failure to complete discovery within the time allowed is not recognized as good cause.  
17 If any of the dates identified in this Order or the Local Civil Rules fall on a weekend or federal  
18 holiday, the act or event shall be performed on the next business day.

19 **Counsel are directed to review Judge Jones' Chambers Procedures** at  
20 <http://www.wawd.uscourts.gov/judges/jones-procedures>. Counsel are expected to abide by the  
21 requirements set forth therein. Failure to do so may result in the imposition of sanctions.

1 Links to Local Rules, Electronic Filing Procedures for Civil and Criminal Cases, court  
2 forms, instruction sheets, and General Orders, can be found on the Court's website at  
3 [www.wawd.uscourts.gov](http://www.wawd.uscourts.gov).

#### 4 **Discovery**

5 As required by LCR 37(a), all discovery matters are to be resolved by agreement if  
6 possible. Counsel shall also cooperate in preparing the agreed pretrial order in the format  
7 required by LCR 16.1. The parties shall comply with Judge Jones' chambers procedures  
8 regarding discovery disputes.

#### 9 **MDL Orders**

10 The parties agree to abide by certain orders entered in multi-district litigation from which  
11 this matter was transferred. *See* Dkt. 25, at 5. These orders are docketed with the parties'  
12 stipulated joint status report. *See* Dkt. 25-1, at 7 (stipulated protective order), 30 (Stipulation and  
13 Order Concerning Redactions of Material from Additional Adverse Event Reports, Complaints,  
14 and Other Documents), 36 (Stipulation and Order Concerning Protective Order and Redactions  
15 of Material from Defendants' Expedited ESI Production), 43 (Electronically Stored Information  
16 and Document Form and Format Production Protocol), 59 (Joint Record Collection), and 78  
17 (Deposition Protocols).


#### 18 **Settlement**

19 If this case settles, plaintiff's counsel shall notify Deputy Clerk Kelly Miller at  
20 [Kelly\\_Miller@wawd.uscourts.gov](mailto:Kelly_Miller@wawd.uscourts.gov), as soon as possible. Pursuant to LCR 11(b), an attorney who  
21 fails to give the Deputy Clerk prompt notice of settlement may be subject to such discipline as  
22 the Court deems appropriate.

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1 The Clerk is directed to send copies of this Order to all parties of record.

2 Dated this 11th day of June, 2020.

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6 J. Richard Creatura  
7 United States Magistrate Judge  
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